U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

August 14, 2025

BY ECF
The Honorable Jessica G. L. Clarke
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

  Re: *United States v. Peraire-Bueno*, S1 24 Cr. 293 (JGLC)

Dear Judge Clarke:

  The Government respectfully submits this letter on behalf of the parties to propose modifications to certain pre-trial deadlines outlined in the Court's September 25, 2024 scheduling order, as amended by the Court's recent order directing the defendants to provide expert disclosures by August 13, 2025. (*See* Dkts. 46, 119).

  On August 13, 2025, the defendants provided the Government with four expert disclosures in accord with the Court's order. The parties have conferred and jointly propose the following modifications for the Court's approval:

	Current Deadline	**Proposed Deadline**
Parties to file *Daubert* motions	August 22, 2025	**September 10, 2025**
Parties to submit joint proposed *voir dire*, requests to charge, verdict sheet, and optional pretrial memorandum of law	September 8, 2025	**September 15, 2025**
Parties to file oppositions to *Daubert* motions	September 8, 2025	**September 24, 2025**

Finally, the parties have conferred, but are unable to reach agreement, regarding a date for the Government to provide rebuttal expert disclosures, if any. Thus, the parties jointly and respectfully request that the Court permit the Government and defendants to file letter briefs by **Monday, August 18, 2025**, not to exceed two single-spaced pages (excluding exhibits), outlining their respective positions regarding the Government's rebuttal expert disclosure date.

Respectfully submitted,

JAY CLAYTON
United States Attorney

by: _____/s/_____
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Cc: Counsel of Record (by ECF)